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Attorneys for Plaintiff

**Motion for Admission Pro Hac Vice forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

EQUALITY STATE POLICY CENTER,

Plaintiff,

v.

CHUCK GRAY, in his official capacity as
Wyoming Secretary of State; *et al.*,

Defendants.

Case No.: 1:25-cv-00117

**PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiff Equality State Policy Center moves this court for a Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65 to enjoin Defendants from enforcing the documentary proof of citizenship requirement ("DPOC requirement") in House Bill 156 ("HB 156"), codified in Wyoming law at Wyo. Stat. Ann. §§ 22-1-102(a)(xxvii), 22-1-102(a)(lvi), 22-3-102(a)(i), 22-3-103(a)(x), 22-3-117(a), and 22-3-118(a)(ii).

As set forth in the attached memorandum and supporting exhibits, (1) Plaintiff is substantially likely to succeed on the merits; (2) absent an injunction, Plaintiff, its members, and its constituents will suffer irreparable harm; (3) the injury to the Plaintiff, its members, and its constituents outweighs the injury to the Defendants; and (4) an injunction is in the public interest. *See Winter v. Nat'l Res. Def. Council*, 555 U.S. 7, 20 (2008).

Pursuant to Local Rule 7.1(a), Plaintiff requests a hearing on its motion.

Dated: May 23, 2025

Respectfully submitted,

/s/ Elisabeth C. Frost

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